

OSHA On-Site CONSULTATION

12-01-23

Warehouse Safety



On-Site Consultation

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MISSION

With the Occupational Safety and Health Act of 1970, Congress created the Occupational Safety and Health Administration (OSHA)

to assure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance.

ASSISTANCE

SAFETY AND HEALTH
HAZARD RECOGNITION,
ABATEMENT
&
TRAINING

CONSULTATION PROGRAM

- Confidential
- Free



National Emphasis Program: Warehousing and Distribution Center Operations

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12-01-2023

Purpose of this NEP

- This NEP is intended to enhance OSHA's enforcement on:
 - Warehousing and distribution centers
 - Mail/postal processing and distribution centers
 - Couriers and express delivery services
 - Local messengers and local delivery industries
 - High injury rate retail establishments



Purpose of this NEP

- Improve worker safety by reducing exposure to common hazards in the targeted industries such as:
 - powered industrial vehicle operations
 - material handling/storage
 - walking-working surfaces
 - means of egress
 - fire protection
- Improve worker health outcomes by reducing exposure to heat and ergonomic hazards.



Hazards and Solutions

- Warehouse workers face many hazards, but proper design, planning and training can keep them safe. Below is a link that provides information on the various hazards and the solutions to those hazards.

[Warehousing - Hazards and Solutions | Occupational Safety and Health Administration \(osha.gov\)](#)

Commonly cited standards for this industry

1910 Subpart D	Walking-working surfaces
1910 Subpart E	Exit routes & Emergency Planning
1910 Subpart F	Manlifts
1910 Subpart G	Occupational Health and Environmental Control
1910 Subpart H	Hazardous Materials
1910 Subpart I	Personal Protective Equipment
1910 Subpart J	General Environmental Controls
1910 Subpart K	Medical and First Aid
1910 Subpart L	Fire Protection
1910 Subpart N	Materials Handling and Storage
1910 Subpart O	Machinery and Machine Guarding
1910 Subpart P	Hand and Portable Powered Tools & other Hand-Held Equipment
1910 Subpart S	Electrical
1910 Subpart Z	Toxic and Hazardous Substances



NAICS Codes Targeted by this NEP

Table 2: Covered Industries

NAICS CODES	ESTABLISHMENTS
491110	Postal Service (Processing and Distribution Centers only)
492110	Couriers and Express Delivery Services
492210	Local Messengers and Local Delivery
493110	General Warehousing and Storage
493120	Refrigerated Warehousing and Storage
493130	Farm Product Warehousing and Storage
493190	Other Warehousing and Storage

Table 3: High Injury Rate Retail Establishments

NAICS CODES	HIGH INJURY RATE RETAIL ESTABLISHMENTS
444110	Home Centers
444130	Hardware Stores
444190	Other Building Material Dealers
445110	Supermarkets and other grocery stores
452311	Warehouse Clubs and Supercenters

Resources



- [Warehousing - Overview | Occupational Safety and Health Administration \(osha.gov\)](#)
- [eTools : Grocery Warehousing - Storage | Occupational Safety and Health Administration \(osha.gov\)](#)

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Occupational
Safety and Health
Administration



On-Site Consultation









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Most Citations

Citations	Penalty	Average Penalty	Description
65	\$234,288	\$3,604	Powered industrial trucks.
32	\$154,211	\$4,819	The control of hazardous energy (lockout/tagout).
29	\$137,604	\$4,745	General requirements for all machines.
27	\$72,348	\$2,680	Hazard Communication.
22	\$45,040	\$2,047	Respiratory Protection.
19	\$60,700	\$3,195	General. Examination, installation, and use of equipment
15	\$48,401	\$3,227	Wiring methods, components, and equipment for general use.
14	\$84,383	\$6,027	General requirements.
13	\$151,886	\$11,684	Maintenance, safeguards, and operational features for exit routes.
12	\$56,403	\$4,700	Occupational noise exposure.
10	\$69,710	\$6,971	OSH Act General Duty Paragraph

Highest Average Citation

Citations	Penalty	Average Penalty	Description
13	\$151,886	\$11,684	Maintenance, safeguards, and operational features for exit routes.
3	\$26,829	\$8,943	Handling materials - general.
10	\$69,710	\$6,971	OSH Act General Duty Paragraph
14	\$84,383	\$6,027	General requirements.
8	\$43,100	\$5,388	Slings.
7	\$36,493	\$5,213	Mechanical power-transmission apparatus.
7	\$35,580	\$5,083	Fall protection systems and falling object protection-criteria and practices.
32	\$154,211	\$4,819	The control of hazardous energy (lockout/tagout).
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29 CFR 1910.178(l)(2)(ii)

The Standard Requires

- Training Program
- Trained operators

Training Program

- General principles of safe truck operation,
- Types of vehicle(s) being used in the workplace
- Hazards of the workplace created by the use of the vehicle(s)
- General safety requirements of the OSHA standard



Trained operators

- Must know how to do the job properly
- Do it safely as demonstrated by workplace evaluation.



Formal Training

- Lecture
- Video
- Etc



Practical Training

- Demonstration in Workplace
- Practice



Employer Certification



- Received the Training (Once every 3 Years)
 - Operator Name
 - Training Date
 - Evaluation Date
 - Name of Person(s) Performing the Training or Evaluation
 - Expiration in 3 years

Prior to Operation

- Evaluation of Employee Performance
- Determine Competency



Refresher Training

- Refresher training is needed whenever an operator demonstrates a deficiency in the safe operation of the truck



Training Program Content

- Powered industrial truck operators shall receive initial training in the following topics, except in topics which the employer can demonstrate are not applicable to safe operation of the truck in the employer's workplace. [29 CFR 1910.178(l)(3)]

Training Program Content

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate.
- Differences between the truck and the automobile.
- Truck controls and instrumentation: where they are located, what they do, and how they work.
- Engine or motor operation.
- Steering and maneuvering.

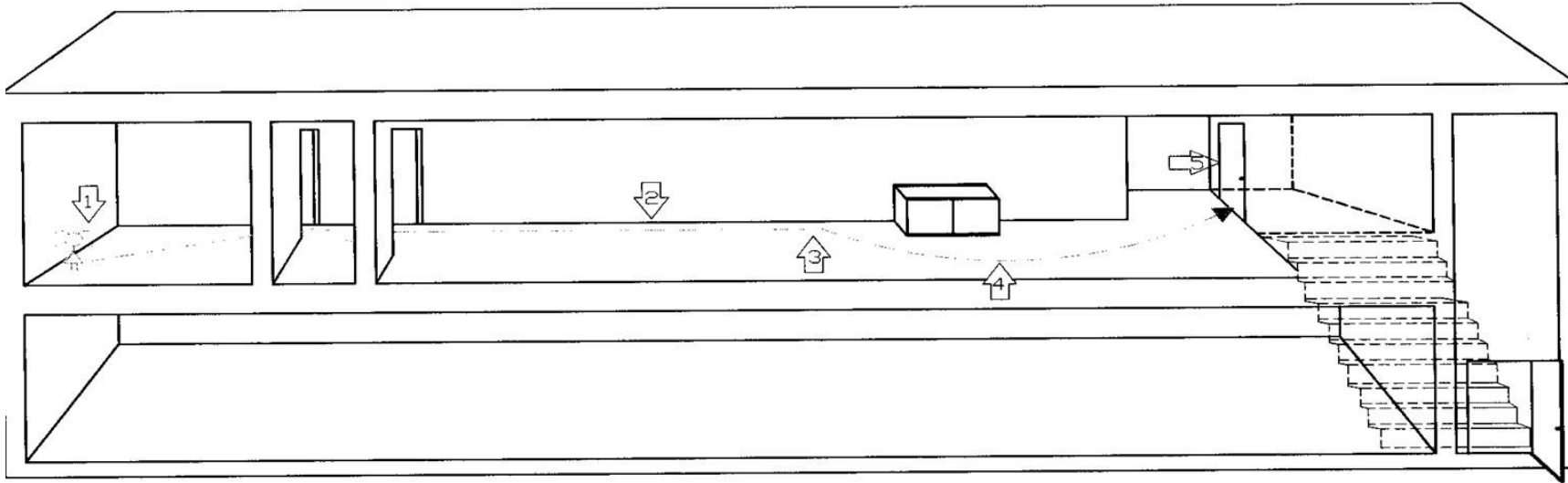


Chapter 7 – E G R E S S

- MEANS of EGRESS COMPONENTS

- Exit Access
 - Leads to an exit
- Exit
 - Starts when step into an exit, ends when step into discharge. Fire Protected Route
- Exit Discharge
 - From exit to public way

COMPONENT PARTS of EGRESS



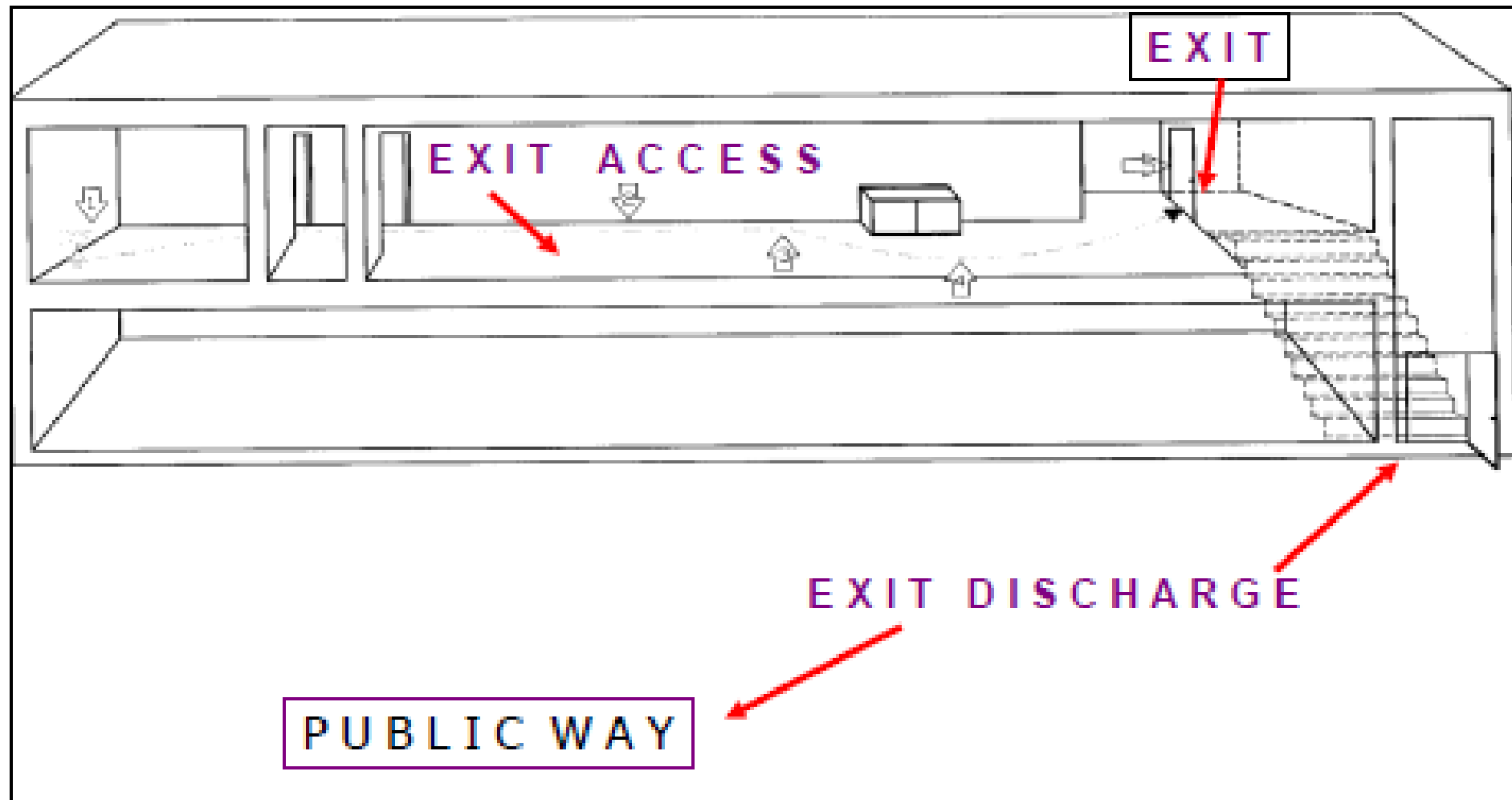
Point out the component parts of the MEANS of EGRESS

☐ EXIT ACCESS

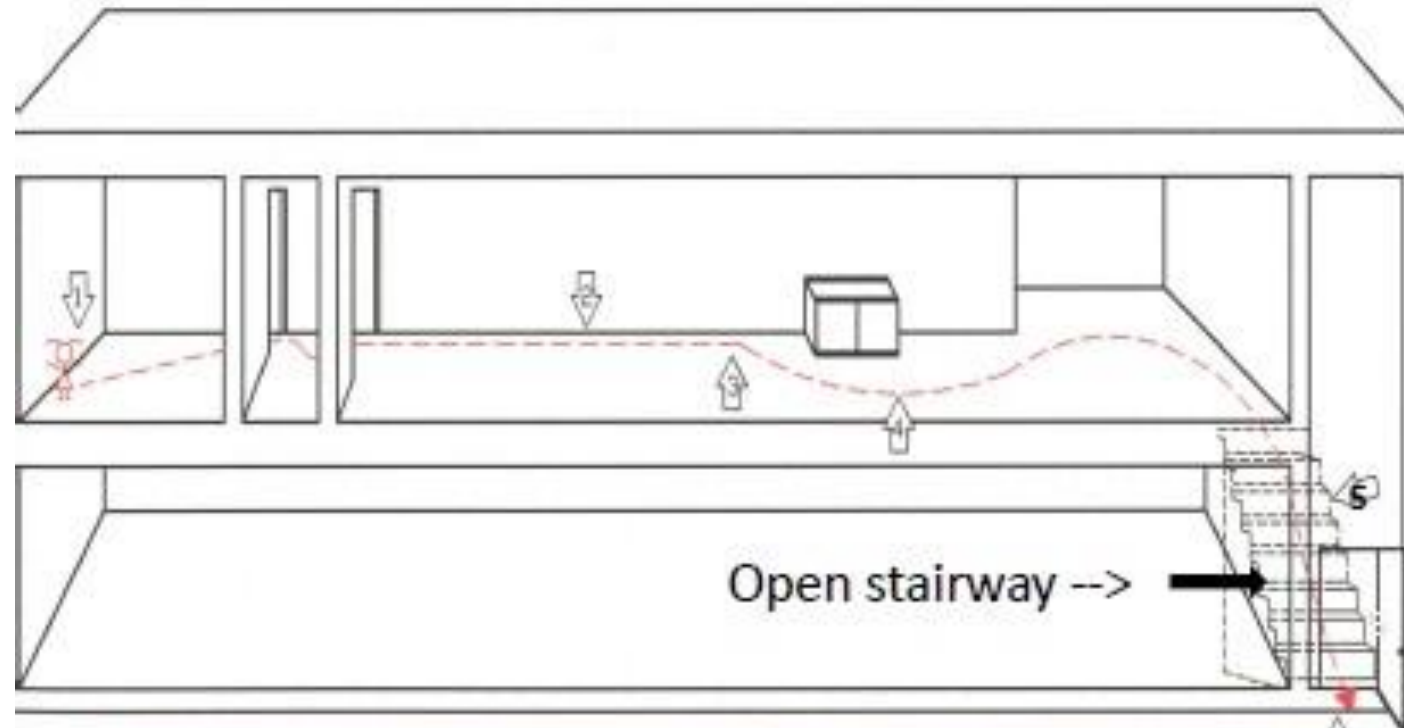
☐ EXIT

☐ EXIT DISCHARGE

COMPONENT PARTS of EGRESS



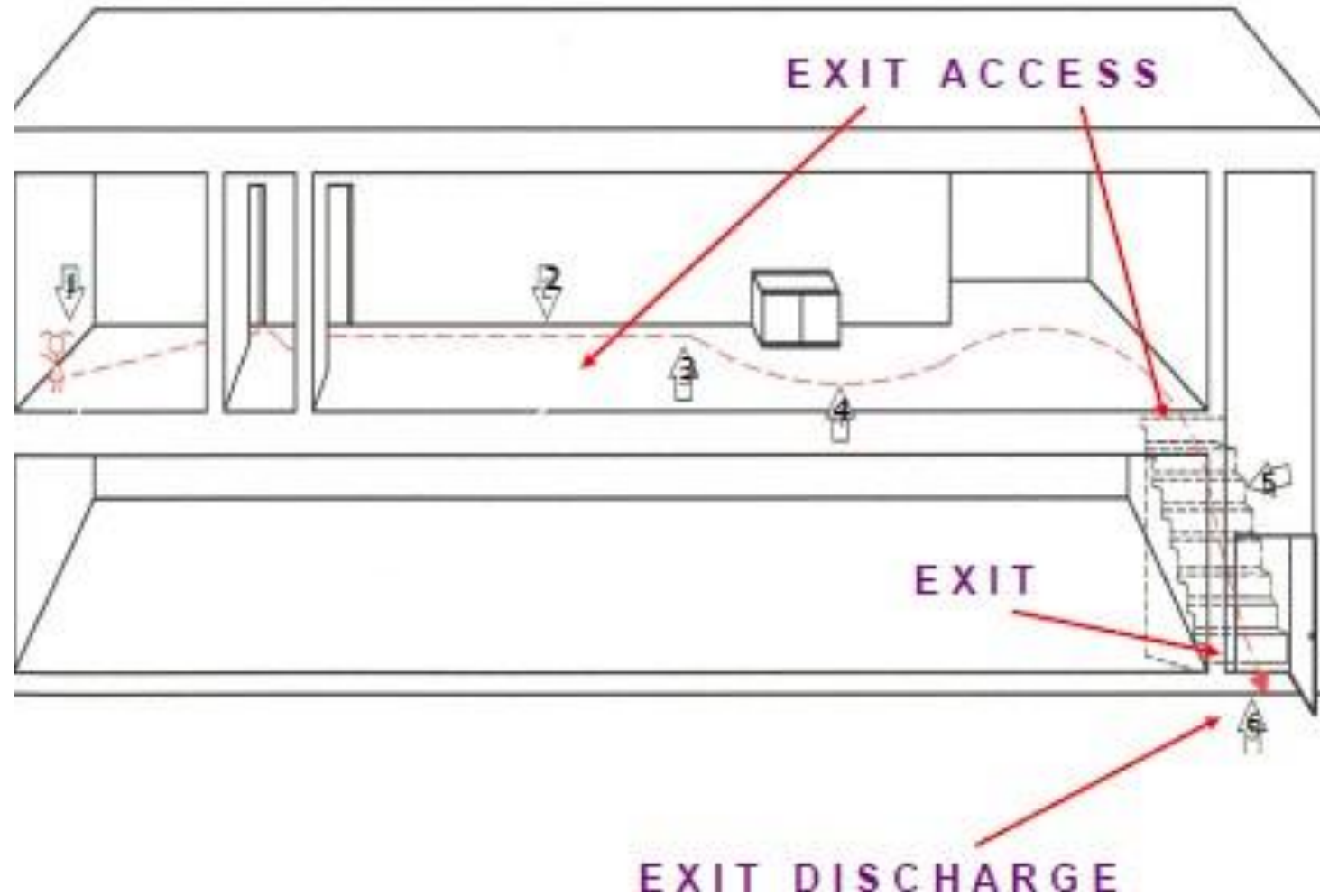
COMPONENT PARTS of EGRESS



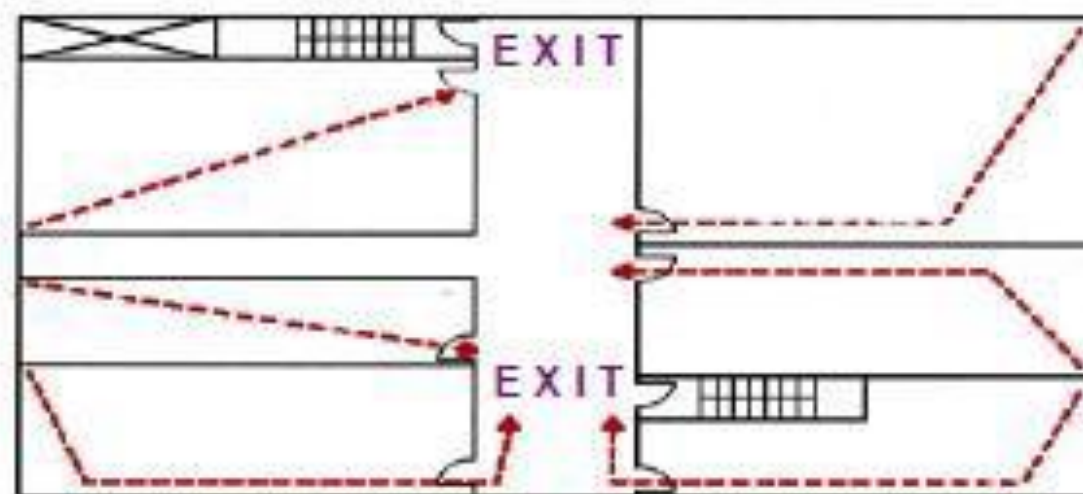
Point out the component parts of the MEANS of EGRESS

- ❖ EXIT ACCESS
- ❖ EXIT
- ❖ EXIT DISCHARGE

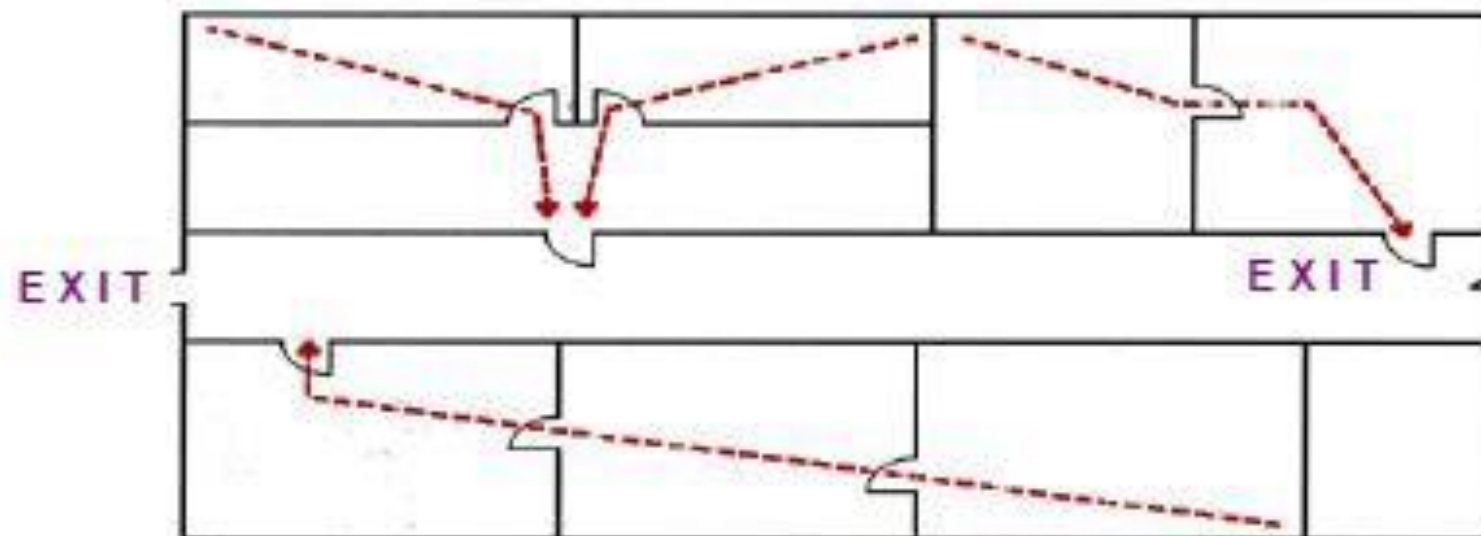
COMPONENT PARTS of EGRESS



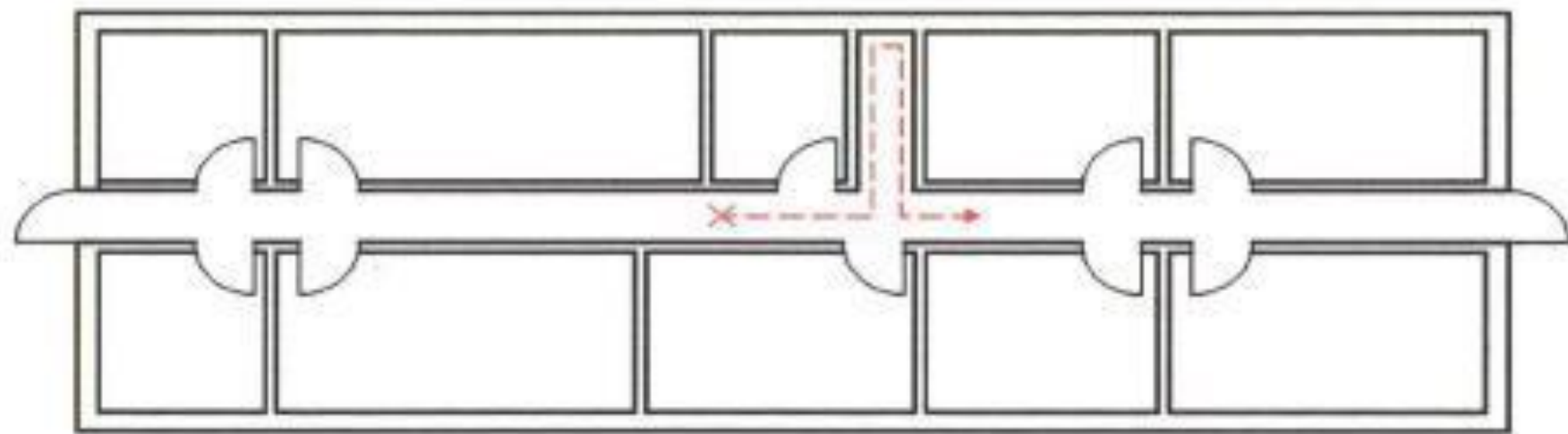
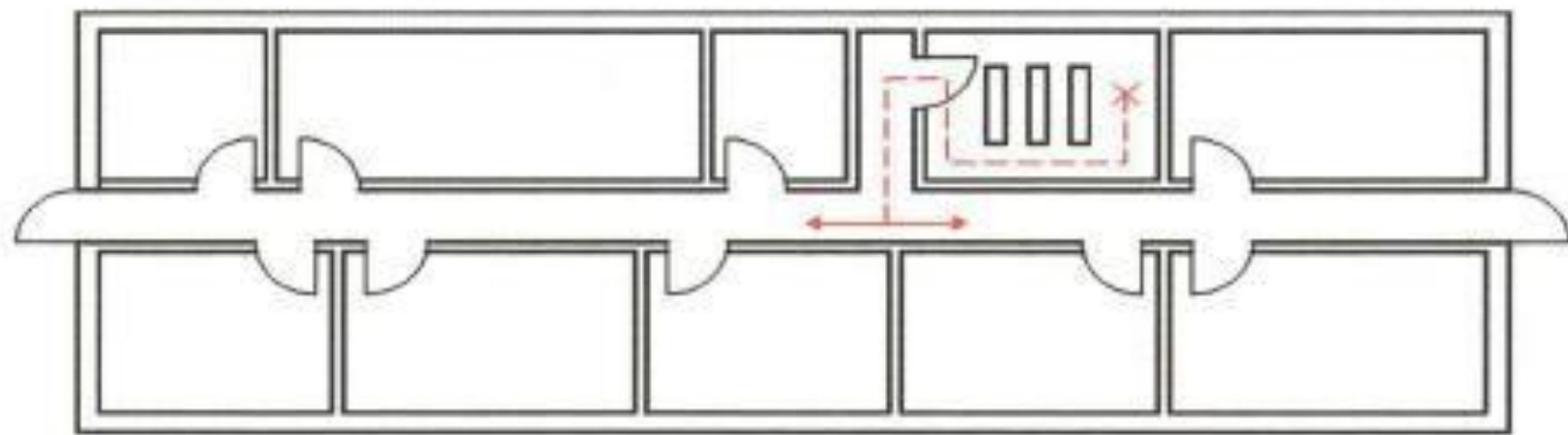
COMMON PATH of TRAVEL



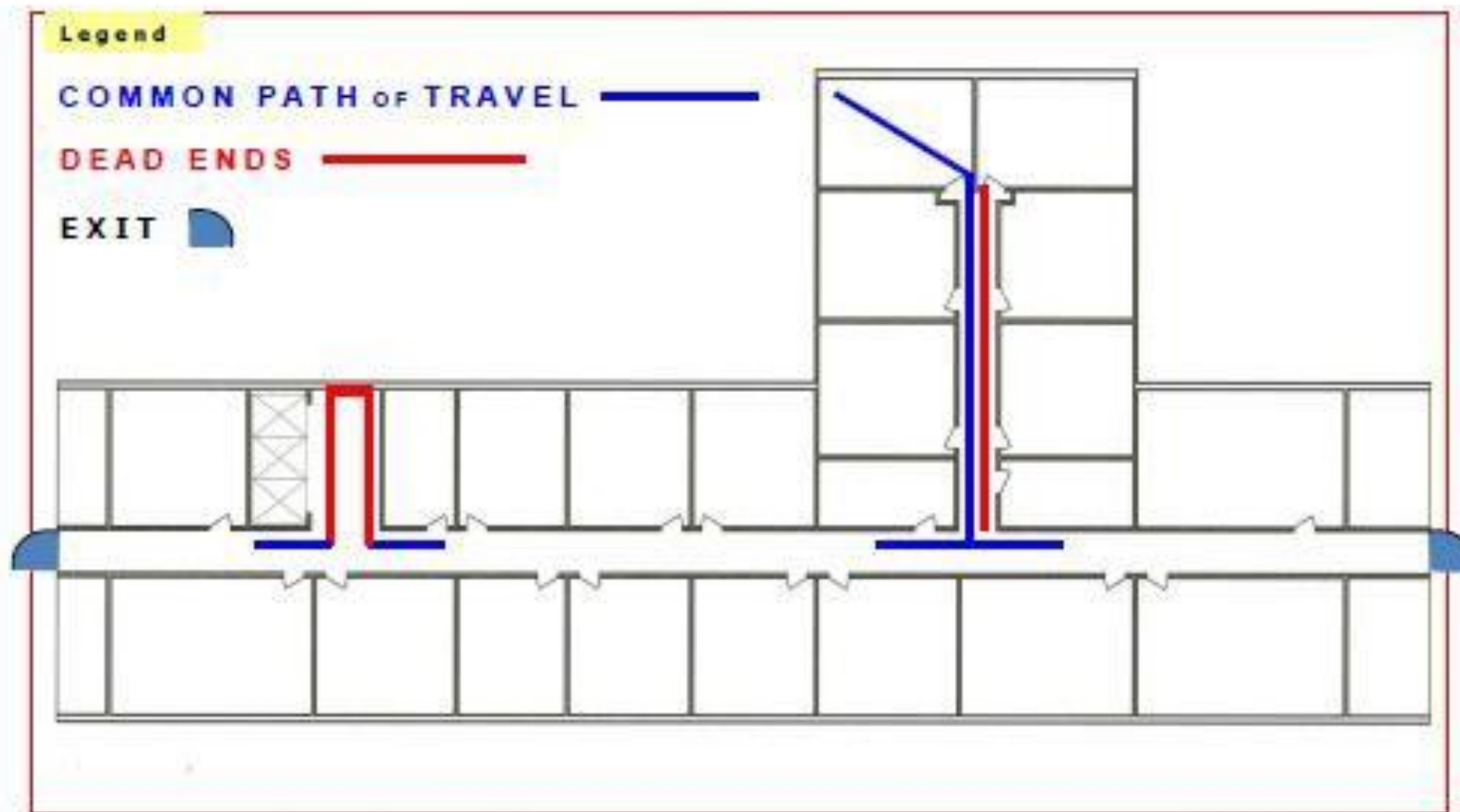
THAT PORTION TRAVELED BEFORE CHOICE OF TWO EXITS IS COMMON PATH OF TRAVEL



DEAD ENDS, COMMON PATH and REMOTENESS

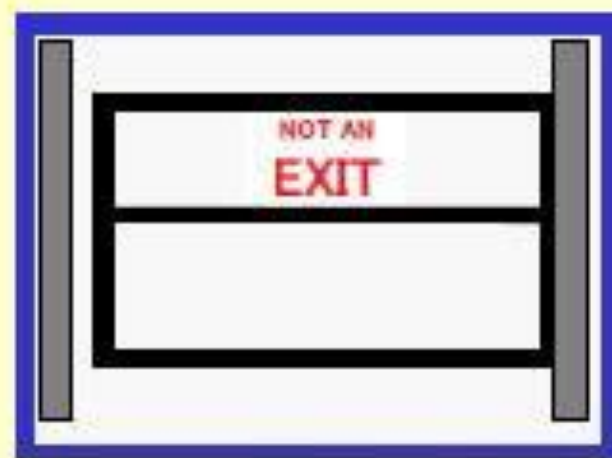


DEAD ENDS, COMMON PATH and REMOTENESS



Exit discharge

Exit stairs that continue beyond the level on which the exit discharge is located must be **interrupted at that level by doors, partitions, or other effective means** that clearly indicate the direction of travel leading to the exit discharge.



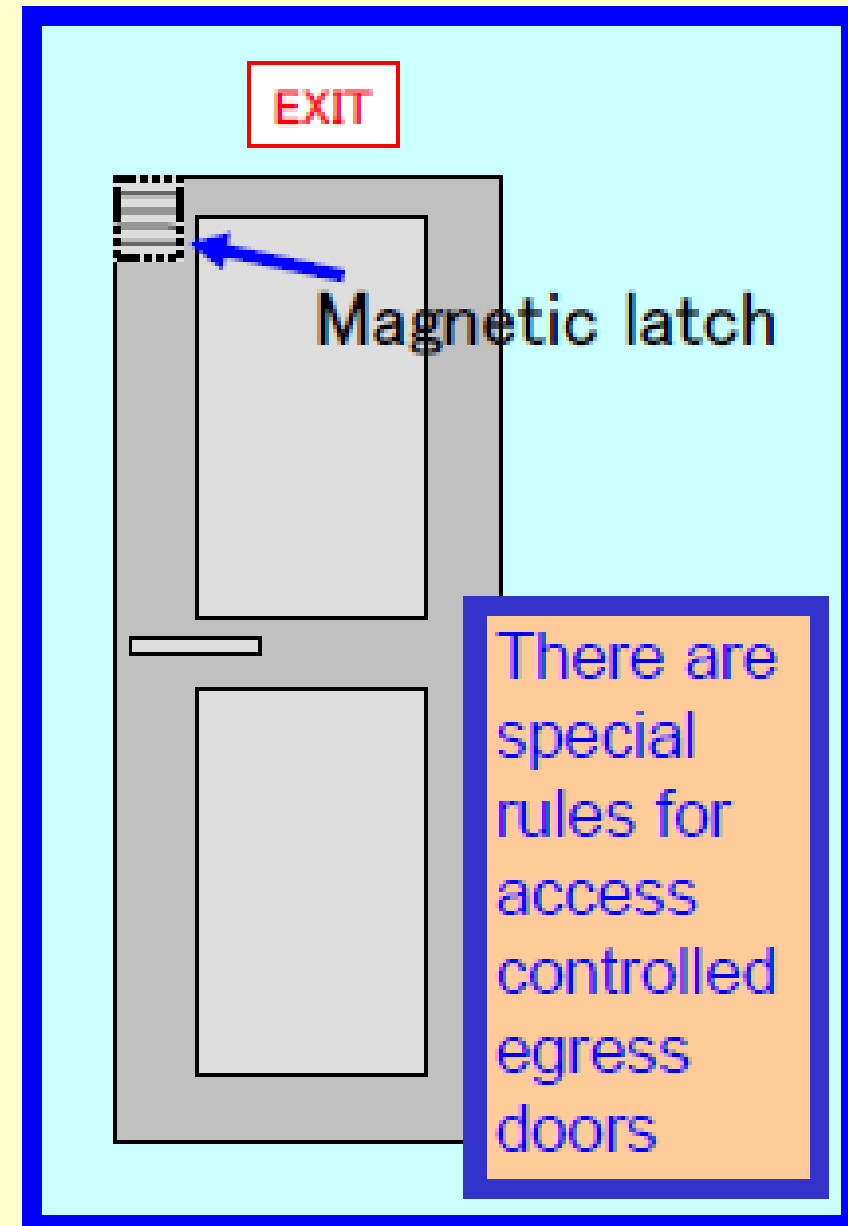
Exit Doors Must Be Unlocked

- **Must be able to open from the inside** at all times without
 - keys,
 - tools, or
 - special knowledge

Panic bars are permitted

Must be free of any device or alarm that could restrict emergency use if the device or alarm fails

1910.36 (d)(1) and (2)



Exit Doors

May be locked from the
inside **only** in

- mental,
- penal, or
- correctional facilities

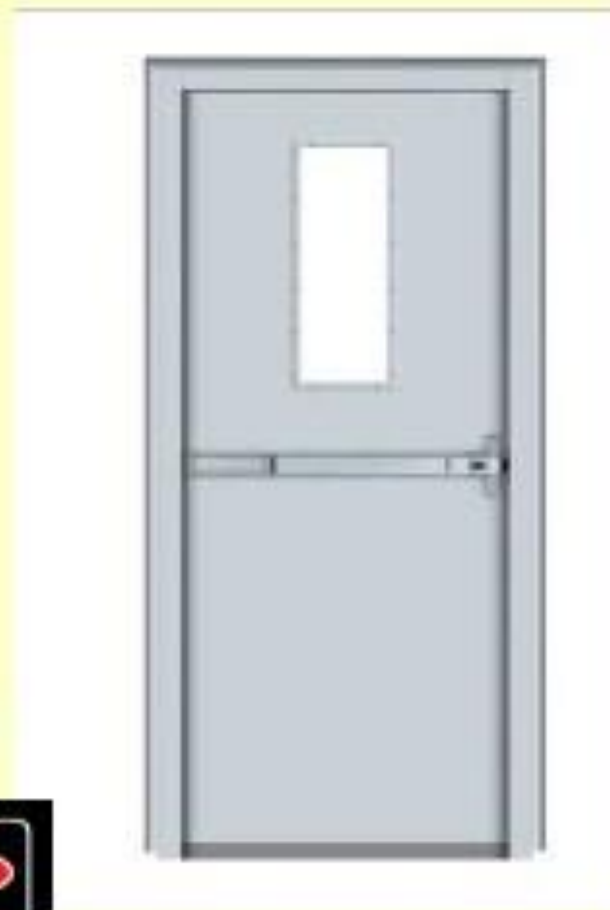
where there is **constant supervision** and the employer has a **plan to remove occupants** from the facility during an emergency.

1910.36 (d)(3)



Side Hinged Doors

- Must be used to connect any room to an exit route
- Must swing in the direction of exit travel if:
 - Designed to be occupied by more than 50 people
 - Or room is a high hazard area



1910.36 (e)(1)&(2)



Exit Route Capacity and Dimensions

Objects that project
into the exit route
must not reduce the
width of the exit
route to less than
the minimum width
requirements for exit
routes.



Minimize Danger to Employees

Exit routes must be kept free of explosive or highly flammable furnishings or other decorations.



Minimize Danger to Employees

Exit routes must be
free and unobstructed



Minimize Danger to Employees

Exit routes must be free and unobstructed



Door
locked
and
blocked

Minimize Danger to Employees

- Arrange exit routes so that employees will **not have to travel toward a high hazard area**, unless it is effectively shielded
- **Emergency** safeguards (e.g., sprinkler **systems**, alarm systems, fire doors, exit lighting) must be in proper **working** order at all times



Flammable vapors and
gases
Combustible dusts
Combustible fibers or flyings
Chemical or explosives
manufacturing
storage or handling

Exit routes must be maintained during construction, repairs, or alterations

Employees must not be exposed to hazards of flammable or explosive substances or equipment used during construction, repairs, or alterations, that are beyond the normal permissible conditions in the workplace, or that would impede exiting the workplace.



1910.37 (d)(3)



Contractor
supplies
stored in
exit stair
shafts

1910. 157(a) Portable Fire Extinguishers

Scope and Application

Requirements:

- placement
- use
- maintenance
- testing

of fire extinguishers provided
for use by employees





**This guy
is blocked**





REQUESTS FOR SERVICE

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